

SUBMISSION

by the



PACKAGING COUNCIL
OF NEW ZEALAND (INC)
(PAC.NZ)

to the

Auckland Council

on the

**Auckland Plan Discussion Document
“Auckland Unleashed”**

31st May 2011

1.0 Introduction

This submission is from:

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- 1.1 The Packaging Council of New Zealand is industry's voice on policies affecting packaging and packaging waste. We are the focal point for providing impartial, factual information on packaging and the impact of packaging on the environment.
- 1.2 We are committed to minimising the environmental impact of packaging and increasing packaging recovery rates by advocating cost effective, sustainable solutions and championing product stewardship.
- 1.3 The Packaging Council represents the whole packaging supply chain, including raw material suppliers, packaging manufacturers, brand owners, retailers and recycling operators.
- 1.4 The Packaging Council has approximately 135 members. We represent more than 80% of the packaging manufacturing industry and 75% of New Zealand's top 100 food and grocery brands. Packaging Council members contribute approximately NZ\$20 billion to the New Zealand economy.
- 1.5 The Packaging Council has been intimately involved in the development of environmental policy affecting packaging since at least 1996 when it signed the first

New Zealand Packaging Accord. The organisation was involved in developing the 2002 New Zealand Waste Strategy, provided data for the 2006 review of targets and assisted with the research behind the Parliamentary Commissioner for the Environment's 2006 report '*Changing behaviour: Economic instruments in the management of waste*'. The Packaging Council was a principle signatory to the second New Zealand Packaging Accord (2004 – 2009).

- 1.6 The Packaging Council has recently launched its Packaging Product Stewardship Scheme, with a goal to have the scheme accredited by the Minister for the Environment under the Waste Minimisation Act 2008. The Packaging Council has also developed a *Code of Practice for Packaging Design, Education and Procurement*. The objective of the Code is to assist stakeholders in the design, manufacture and end-of-life management of packaging to minimise its environmental impacts.
- 1.7 The Packaging Council would welcome the opportunity to make an oral submission.**

2.0 Summary

- 2.1 This submission is limited to the Waste Management and Minimisation section of the Auckland Plan discussion document "Auckland Unleashed" points 334 to 338 inclusive.
- 2.2 Whilst the Packaging Council broadly supports the Auckland Council's vision for an eco-city we are not supportive of the conclusions reached in the Auckland Council Waste Assessment document¹ and are alarmed that this document has been used as the basis for the waste management and minimisation section in the Auckland Plan discussion document.
- 2.3 The Packaging Council would like to recommend that this section is either removed completely from the Auckland Plan, or at the least does not cite recommendations which have yet to be fully analysed and therefore may be subject to substantial change.

¹ Auckland Council waste assessment (Produced under the auspices of the ATA)

- 2.4 The Auckland Council waste assessment document has yet to proceed to the next stage of releasing the draft Waste Management and Minimisation Plan (WMMP). Only at this stage will detailed analysis work be undertaken to validate the methodologies discussed in the waste assessment document. There will also be a Special Consultative Procedure whereby all interested parties will have the opportunity to address the issues in greater and more specific detail. Without the benefit of the rigorous analysis the draft WMMP must go through, the recommended option 3 attributes cited in the Auckland Plan discussion document could be considered a 'wish-list' which is not a sound reason to include in such an important strategic document such as the Auckland Spatial plan.
- 2.5 The Packaging Council's primary concern with the Auckland Council Waste Assessment document, as it relates to the sections pertaining to packaging, is that the assessment process appears predicated on the assumption that it is the packaging industry which drives consumption of packaging material. This is incorrect since the packaging industry produces at the request of the brand owners and retailers, who in turn meet the demands of society for a whole range of packaged products.
- 2.6 In preparation of the Auckland Council Waste Assessment document preliminary consultation meetings were held with packaging manufacturers, waste service providers, Ministry for the Environment, the Packaging Council and Glass Packaging Forum (the latter two being trade associations who by the nature of their membership must maintain a 'high-level' approach which does not overly represent any one company or sector of the membership). No official meetings were conducted with brand owners or retailers. We regard this as a significant oversight in the assessment process and would suggest that it cannot possibly be conducive to producing a balanced assessment of the packaging and packaging waste issues facing Auckland City, nor to making sound recommendations.
- 2.7 For example, advocating for Extended Producer Responsibility (EPR), (leaving aside the validity of using Waste Minimisation funds to lobby central government²), directly contradicts the stated aim of option 3 which is to increase the influence the Council has over waste streams. Since the key to EPR schemes is producer responsibility for take-back, these would encourage development of parallel waste and recycling

² Auckland Council waste assessment (Produced under the auspices of the ATA) Chapter 8 pages 190 & 191 references P4 & P7

schemes. Arguably, this would result in less influence over the waste stream by the Council, not more.

- 2.8 Lastly we would suggest that the tone of the measures relating to packaging do not reflect global trends, where tangible collaboration between all parties in the supply chain, including those responsible for final disposal, is proving a more successful model than draconian fiscal measures, such as compulsory EPR schemes, which in the case of this waste assessment appears to simply shift the burden of costs from one party to another, without consideration of other models of engagement, or indeed commercial realities.
- 2.9 The above points, in our view, highlight that there is a lack of evidential basis to support the proposed options as required by s79(4)(c) of the Local Government (Auckland Council) Act 2009.
- 2.10 The Packaging Council would welcome any opportunity to be a part of an advisory group to assist the Council in providing a more detailed and balanced assessment of packaging, and packaging waste in the Auckland context.